

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

AECOM ENERGY & CONSTRUCTION,  
INC.,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,  
Defendant.

Case No. 20-2016 C

JOINT STATUS REPORT

On April 18, 2024, the Court entered a revised scheduling order and further ordered that the parties “jointly submit a status report every 30 days . . . updating the court on the progress of discovery.” ECF No. 45. The Court ordered that the first of these reports is “due on May 15, 2024, and the last due after the close of expert discovery, on May 27, 2025.” *Id.* In accordance with the Court’s order, plaintiff AECOM Energy & Construction, Inc., formerly known as URS Energy & Construction, Inc., (“URS”) and defendant the United States of America (the “Government”) submit this Joint Status Report updating the Court on the status of discovery.

Since the last status conference with the Court, which occurred on April 18, 2024, the Government produced approximately 92,500 documents and URS produced approximately 1,700 documents. With the assistance of TAR, the Government has now finished producing documents that will not be subject to a linear-type privilege review, and has identified approximately 57,000 documents that it will manually review for privilege. The Government has begun its manual review and will attempt to produce documents on a rolling basis to URS every two weeks, the first production of which will likely be delivered at some point next week and the last of which it will attempt to produce on or before the July 3, 2024 deadline for completion of Government document production.

URS is continuing to confer with the Government regarding the specifics and timing for the Government's review and production of the remaining 57,000 documents. The Government explained that it has approximately doubled the number of reviewers available to conduct privilege review, and all have been instructed to devote all feasible time to completing privilege review in this case, although each such reviewer still has their obligations related to their normal workload. URS conveyed that unless the Government adds significant additional resources to its review, it is unlikely the July 3 deadline will be met.

The parties continue to review the recent productions of documents in preparation for depositions and to identify and attempt to resolve any deficiencies. The parties have also exchanged lists of initial deponents and are conferring about the schedule for depositions.

Respectfully submitted,

s/ Charles C. Speth  
CHARLES C. SPETH, *Counsel of Record*  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
2100 Pennsylvania Avenue N.W.  
Washington, D.C. 20037  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363  
Email: charles.speth@wilmerhale.com

ANDREW E. SHIPLEY, *Of Counsel*  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
2100 Pennsylvania Avenue N.W.  
Washington, D.C. 20037  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363  
Email:  
andrew.shipley@wilmerhale.com

*Attorneys for Plaintiff AECOM Energy  
& Construction, Inc.*

MICHAEL D. GRANSTON  
Deputy Assistant Attorney General

PATRICIA M. MCCARTHY  
Director

s/ Lisa L. Donahue  
LISA L. DONAHUE  
Assistant Director

s/ Meen Geu Oh  
MEEN GEU OH  
Senior Trial Counsel  
IOANA CRISTEI  
EBONIE BRANCH  
DANIEL BERTONI  
Trial Attorneys  
Commercial Litigation Branch  
Civil Division  
Department of Justice  
P.O. Box 480  
Ben Franklin Station

Washington, D.C. 20044  
Telephone: (202) 307-0184  
Meen-Geu.Oh@usdoj.gov

*Attorneys for Defendant*

*Of Counsels:*

BRANDON MIDDLETON  
Chief Counsel  
BRADY L. JONES, III  
Assistant Chief Counsel for Acquisition and Litigation  
SKY W. SMITH  
Trial/Procurement Counsel Office of Chief Counsel  
Environmental Management Consolidated Business  
Center  
U.S. Department of Energy

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